

United States District Court  
for the  
Southern District of Texas

UNITED STATES OF AMERICA )  
V. )  
**Stephen Herman** ) Case Number:  
**Dayton, TX** )  
)  
)  
**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 22, 2020 in the county of Webb in the  
(Date) Southern District of Texas, the defendant(s) violated:

*Code Section*

*Offense Description*

Title 8 United States Code, Section 1324 Knowing and in reckless disregard of the fact that a certain alien had come to, entered, and remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such alien within the United States, by means of transportation and otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

See attachment "A".

Continued on the attached sheet.

Complainant's Signature

Jansen Jones, HSI Special Agent

Printed Name and Title

Sworn to before me and signed in my presence,

Date: June 24, 2020

Judge's Signature

City and State: Laredo, Texas

Diana Song Quiroga

Printed Name and Title

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**[CONT OF BASIS OF COMPLAINT]**

I, Jansen Jones, declare and state as follows:

On June 22, 2020, a Border Patrol Agent (BPA) was working his assigned duties at the United States Border Patrol Checkpoint located at mile marker 29 (C-29) on IH-35 north of Laredo, TX when a blue tractor bearing temporary paper tags 74479F2 hauling a white trailer bearing Oklahoma license plate 8461LH approached his lane for an immigration inspection. A BPA with his service canine partner was conducting a free air sniff near the pre-primary inspection area when his canine alerted to the presence of concealed humans and/or the odors of controlled substances on this tractor trailer. The tractor-trailer was referred to the secondary inspection area for a search.

At secondary, the canine again alerted on the tractor trailer. The trailer was locked with a combination lock, and when asked for the combination the driver, later identified as Stephen HERMAN (HERMAN), stated he did not know the combination. The lock was removed with bolt cutters, and once removed several individuals were discovered inside the trailer, with limited air ventilation, and without the ability to escape. An immigration inspection of the individuals determined that they were all present in the United States illegally with no legal documents or right to remain in the United States. The driver and fifty-nine (59) concealed humans were placed under arrest and escorted inside the United States Border Patrol Checkpoint for processing.

HSI Laredo Special Agents (SAs) responded to the Laredo North immigration checkpoint to interview the individuals involved.

HERMAN was read his Miranda Rights in the English language, acknowledged his rights and agreed to provide a statement without the presence of an attorney. HERMAN stated he made arrangements with Hispanic men in Laredo to drive the tractor trailer north to San Antonio, Texas, where he was supposed to drop off the trailer. HERMAN stated he would be paid FIVE THOUSAND DOLLARS (5,000.00 USD) for the job. Herman stated he is not a commercial truck driver nor did he have a valid Texas driver's license.

Herman drove to Laredo from Houston, Texas and arrived at a truck yard in Laredo this morning where he picked up the tractor trailer, which was already loaded. HERMAN observed a Hispanic male driving a black Dodge Camaro, facing the tractor trailer, watching over this tractor trailer and truck yard. He further stated he was not concerned about the contents of the trailer, and he just got into the tractor and began driving toward the IH-35 Border Patrol checkpoint. Once he was past the IH-35 Border Patrol checkpoint, HERMAN anticipated a phone call and would be told exactly where to drive the tractor-trailer in San Antonio, Texas.

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**[CONT OF BASIS OF COMPLAINT]**

HSI SAs interviewed Mexican nationals, Jesus SOSA-Adan and Jordy Martinez-Salazar and both men stated they are citizens of Mexico, and both men made arrangements with human smugglers in Mexico for various sums of money to be transported into the United States and on to their final destination within the United States. Neither one saw the driver of the tractor trailer.

[END]